

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Law Office of Michael P. Otto, LLC

1030 Stelton Road, Suite 102

Piscataway, New Jersey 08854

By: Michael P. Otto, Esq. (MPO7635)

(732) 819-7000

(732) 819-7575 - Fax

motto@ottolawoffice.com

Counsel for Debtors

In re Walter & Novlett Taylor,

Debtor(s).

Case No. 19-11250(RG)

Hearing Date: April 17, 2019 @ 10:00 a.m.

Judge: Rosemary Gambardella, U.S.B.J.

CERTIFICATION OF COUNSEL IN SUPPORT OF MOTION

MICHAEL P. OTTO hereby certifies as follows:

1. I am counsel for the Debtor in the above referenced bankruptcy proceeding and as such I am fully familiar with the facts set forth herein.
2. On January 21, 2019 the instant bankruptcy was filed.
3. The undersigned prepared a proposed Chapter 13 Plan which sought to modify the mortgage held by NationStar Mortgage. This loan is now serviced/owned by BSI Financial Services. A true and correct copy of the filed Chapter 13 Plan is attached hereto and made apart hereof as **Exhibit A**.
4. The Debtors had started to gather the required documents and execute the necessary forms for a mortgage modification to negotiate a loan modification with NationStar outside of the Chapter 13 bankruptcy.
5. The Debtors did not previously apply for Loss Mitigation as the Debtors were starting the

modification process outside of the Loss Mitigation program and therefore they missed the deadline for entry into the program. Now the Debtors and the Chapter 13 Trustee believe that the modification process would be best concluded under the Loss Mitigation program as it will provide for more streamlined communication between the parties.

6. The Debtor has continued post-petition to make an adequate protection payment to NJHMFA in the amount of \$1,778.05 which includes principal and interest payments at 60% of the pre-petition level.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order allowing entry into the Loss Mitigation program.

The foregoing statements are correct to the best of my knowledge. I would be subject to penalty for making a knowingly false statement to the Court.

Dated: March 18, 2019

By: /S/ Michael P. Otto
Michael P. Otto